

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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|----------------------------|---|--------------------------------|
| CHARLOTTE FREEMAN, et al., | : |                                |
|                            | : | Case No. 14-CV-6601 (DLI)(CLP) |
| Plaintiffs,                | : |                                |
|                            | : |                                |
| -against-                  | : |                                |
|                            | : |                                |
| HSBC HOLDINGS PLC, et al., | : |                                |
|                            | : |                                |
| Defendants.                | : |                                |
|                            | : |                                |

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**DECLARATION OF MICHAEL J. RADINE**

Michael J. Radine declares as follows:

1. I am a member of the Bar of this Court and a Senior Associate at OSEN LLC, counsel for the *Freeman* Plaintiffs. I submit this declaration and exhibits attached hereto in support of Plaintiffs' Omnibus Opposition to Defendants' Motions to Dismiss the Second Amended Complaint.
2. Attached hereto as Exhibit A is a true copy of the Deferred Prosecution Agreement and Statement of Facts between the United States Department of Justice and HSBC Holdings Plc and HSBC Bank USA, N.A.
3. Attached hereto as Exhibit B is a true copy of the Deferred Prosecution Agreement and Factual Statement between the United States Department of Justice and the New York County District Attorney's Office and Credit Suisse AG.
4. Attached hereto as Exhibit C is a true copy of the Deferred Prosecution Agreement and Factual Statement between the United States Department of Justice and Standard Chartered Bank.

5. Attached hereto as Exhibit D is a true copy of the Deferred Prosecution Agreement and Factual Statement between the United States Department of Justice and the Royal Bank of Scotland N.V.

6. Attached hereto as Exhibit E is a true copy of the Deferred Prosecution Agreement and Factual Statement between the United States Department of Justice and Barclays Bank Plc.

7. Attached hereto as Exhibit F is a true copy of the Deferred Prosecution Agreement and Statement of Facts between the United States Department of Justice and Commerzbank AG.

8. Attached hereto as Exhibit G is a true copy of the Deferred Prosecution Agreement and Factual Statement between the United States Department of Justice, New York County District Attorney and Lloyds TSB Bank plc.

9. Attached hereto as Exhibit H is a true copy of the indictment issued against the Islamic Republic of Iran Shipping Lines, et al. by the Grand Jury of the County of New York.

10. Attached hereto as Exhibit I is a true copy of the transcript of oral argument held in the matter captioned *Lelchook, et al. v. Commerzbank AG*, No. 10-cv-5795, before the Hon. Alvin K. Hellerstein, U.S.D.J. on July 18, 2011.

11. Attached hereto as Exhibit J is a true copy of the Order of the Hon. Alvin K. Hellerstein Denying the Defendant's Motion to Dismiss on Standing Grounds dated August 1, 2011 in the matter captioned *Lelchook, et al. v. Commerzbank AG*, No. 10-cv-5795.

12. Attached hereto as Exhibit K is a true copy of the article titled "Will JASTA Yield More Lawsuits Over Terror?" *The National Law Journal*, October 3, 2016 by Jeremy D. Frey.

13. Attached hereto as Exhibit L is a true copy of the New York State Department of Financial Services Order Pursuant to Banking Law §39 In the Matter of Standard Chartered Bank, New York Branch, New York, New York.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: October 11, 2016  
Hackensack, New Jersey

/s/ Michael J. Radine